

Timothy C. Travelstead, Esq. (SBN 215260)
t.travelstead@narayantravelstead.com

Scott C. Ku, Esq. (SBN 314970)
s.ku@narayantravelstead.com

NARAYAN TRAVELSTEAD P.C.
7901 Stoneridge Drive, Suite 230
Pleasanton, CA 94588
Telephone: (650) 403-0150

Attorneys for Plaintiffs
HINDU AMERICAN FOUNDATION;
SAMIR KALRA; MIHIR MEGHANI;
SANGEETHA SHANKAR; DILIP AMIN; SUNDAR IYER;
RAMANA KOMPELLA; AND DOES ONE TO THREE

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

HINDU AMERICAN FOUNDATION, INC.,
a Florida Not For Profit Corporation; Samir
Kalra Mihir Meghani; Sangeetha Shankar;
Dilip Amin, Sundar Iyer, Ramana Kompella
as individuals; and Doe Plaintiffs One to
Three

Plaintiff,

vs.

KEVIN KISH, an individual, in his official
capacity as Director of the California Civil
Rights Department; and DOES 1 - 50,
inclusive,

Defendants.

Case No. 2-22-CV-01656-DAD-JDP

**DECLARATION OF SANGEETHA
SHANKAR ISO MOTION TO
PROCEED UNDER PSEUDONYM**

Date: November 21, 2023
Time: 1:30 p.m.
Judge: Dale A. Drodz

Date Action Filed: September 20, 2022

I, SANGEETHA SHANKAR, declare as follows:

1. I am a United States Citizen of Indian origin and work as the California based Regional Director for the Hindu American Foundation.

2. I have a Masters in Human Resources Management and have resided in the State of California since 2014.

3. I am a devout Hindu and am an active member of my religious community, where I also volunteer in a number of capacities, including teaching religion, classical Indian dance, and Sanskrit. As a Hindu I know that my tradition says that God is in everyone and everything, and therefore, it is my religious and ethical duty to not only respect others regardless of their background, but to do all that I can to alleviate the suffering of others.

4. I learned of the case filed by the California Civil Rights Department against Cisco Systems sometime in 2020 through online news stories.

5. I've been shaken and in disbelief since CRD's definition of my faith which I practice everyday and also derive great strength from. My faith, which teaches that all are equal, is the lens through which I essentially view the world and how I interact with it. As a Hindu, I strongly believe that there is indwelling divinity in each living being and hence treats others with respect and love.

6. I have been a member of multiple communities including natural birth, LLL (La Leche League), midwifery, homeschooling, Indian classical dance, park-date groups, Hindu spiritual communities, Sanskrit learning communities, hiking groups to name a few. We have had so many precious memories of celebrating our Hindu festivals together where we have invited our neighbors, friends and fellow community folks including Christians, Jews and Muslims. I have never asked anyone about their caste or religious

1 beliefs before making them a part of our family's social circles. I've never ever looked at
2 anyone through the lens of caste and never discriminated against anyone due to their
3 beliefs or practices. Also people have treated me as a fellow mom, American, and human
4 being.

5 7. CRD's disparaging definition of Hinduism as having a "religious and social
6 hierarchy" that requires "untouchability practices" by "social custom or legal mandate"
7 has caused me immense mental health issues ranging from anger, anxiety, sleeplessness
8 and incessant worrying, especially as a mother, because it impacts my reputation. My
9 identity as a Hindu American and my celebration of it, I feel has been attacked by the
10 state. As an individual I feel unfairly targeted, profiled and unfairly represented. I worry
11 as to what might transpire for my kids who have grown up with a 100% American
12 identity and do not understand caste. When a Civil Rights Department defines a faith in a
13 negative manner its consequences can be far reaching across schools, offices and much
14 more. How are my kids now going to be treated? Won't they be bullied as being the bad
15 guys whose folks always treat others badly? These thoughts worry me all the time. I am
16 constantly anticipating and worrying for our future.

17 8. I feel utter confusion and helplessness as a citizen of California and the U.S.
18 Spiritually I feel intense pain and agitation within. My faith does not teach me to
19 discriminate and in fact, it asks that I assimilate and contribute to the greatest good. It's
20 my faith that is the foundation of my hard-working, peaceful, law-abiding communities. I
21 have been so proud of my spiritual heritage as an American and its contributions to this
22 land including Swami Vivekananda's visit to Chicago, Dr. Martin Luther King's adoption
of the principle of non-violence and current day widespread practices of yoga,
meditation, rhythmic breathing, vegetarianism and much more. But now I feel extremely
vilified as a Hindu American. CRD's negative portrayal of my faith has started to amplify
hatred and given folks a chance to bad-mouth us and demonize us. Social media posts,
which I have seen, are rife with sentiments like "get the shitskin folks out of CA", "the
Hindus are the real enemies not the Jews." It's horrifying to know that this is probably

just the start of much anticipated Hinduphobia.

9. I have always felt very proud as a Hindu and never hesitated from sharing my faith and its practices with others. As I noted above, neighbors, friends and acquaintances from all walks of life have been a part of my celebration. But now I wonder as to how others will perceive me and if they will even want to be a part of my celebrations. I do not feel the same openness about being Hindu anymore. I feel fear, anxiety and even anger that I feel the need to hide my true identity and my faith as a Hindu American.

10. Even if people do attend such celebrations, the CRD case has become a central topic of discussion, which is very frustrating as it takes away the sense that I can practice my religion without fear or inhibition. I feel like I have to constantly explain myself and cannot just be left to celebrate my faith and identity. My children and I have been asked uncomfortable questions all the time about our faith and this has only been amplified after the CRD case. We have been asked about our caste and whether our ancestors practice caste in an oppressive way. The CRD's abysmal definition of Hinduism has given a bigger platform for folks to attack our religion and claim theirs is superior.

11. I've been shocked and in disbelief that an established government body like the CRD would work closely with a for-profit organization like Equality Labs in spite of their extreme and obvious anti-Hindu hatred. I'm worried for my kids who will be targeted tomorrow by Equality Labs when they are on their college campuses - to be bullied with the same hate-filled rhetoric about Hinduism and their faith that the CRD completely endorses. Psychologically I feel attacked from all sides with no reprieve and no elected representative body to hear me out or understand the gravity of this racial profiling.

12. I feel like I've been wronged. Gross misinterpretations of my faith, scriptures, beliefs, practices have been endorsed by a government that has no understanding of my faith at all. Selective sources of information provided by hate groups have been solely used to make blatant hateful statements about my faith and no one from my community

1 has been approached for a real conversation, study or understanding. I feel terribly
2 angered knowing that such misinformation would absolutely not be acceptable when
3 discussing any other faith group. I feel taken for granted, excluded and vilified.

4 13. Suraj Yenge has been another source of extreme hate towards all Hindus including
5 Dalits. Neither he nor Equality Labs ever approached the vast majority of Hindus who
6 self-identify as 'Dalit' and sought their opinion. As mentioned before, I feel like our
7 community has been totally sidelined while being the center of the so-called " reforms"
8 pushed by anti-Hindu-hate groups and the CRD. I am very worried and also very angry
9 about all of this. Our family life has been disrupted with the hours of work we all are
10 putting towards dismantling Hinduphobia, mobilizing the Hindu community to know
11 their rights and also to make sense of the CRD vs Cisco case.

12 14. It was heart wrenching to hear Mr. Sundar Iyer talk about his experience of being
13 the subject of a witch-hunt and singled out solely based on someone's erroneous
14 interpretation of his presumed religion and caste. I couldn't sleep the entire night after
15 listening to his story.

16 15. Also in my role as a California Regional Director at the Hindu American
17 Foundation, I have spent hours addressing the Hinduphobia that has been coming through
18 due to the CRD's erroneous proclamations about Hinduism. It has consumed entire days
19 and nights and I feel extreme fatigue and disgust! I have no faith anymore in the law of
20 this land or that my rights as a Hindu American will be protected.

21 I declare under penalty of perjury under the laws of the United States that the above is
22 true and correct. Executed on October 2, 2023, at Rancho Cordova, California



SANGEETHA SHANKAR